



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*610 Federal Plaza
Central Islip, New York 11722*

JHK:DCL

August 30, 2016

Honorable Joseph F. Bianco
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Kenner and Constantine
CR-13-607 (S-2)

Dear Judge Bianco:

The undersigned writes, with the consent of defense counsel, to respectfully request that the time to submit the government's forfeiture brief be extended from September 9, 2016 to October 7, 2016. As Your Honor is aware, the Defendant provided the Court with a compact disc ("CD") of information. At the conference on August 2, 2016, the Court directed that the government respond to the information on the CD in its initial forfeiture brief. The CD contains 703 megabytes of data consisting of 198 separate files. Many of the files are hundreds of pages in length, including one Microsoft Word document that is 295 pages alleging criminal acts against various witnesses. In addition, one file is corrupted and cannot be opened. Defense counsel has agreed to try to provide an additional copy of the corrupted file to the government.

The government respectfully requests that the Court grant the government additional time to obtain and properly respond to the information on the CD. Thank you for your courtesies in this matter.

Respectfully submitted,

ROBERT L. CAPERS
United States Attorney

By: /s/ Diane C. Leonardo
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cc: Defense counsel by ECF